

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION

JUDITH K. ROGAN, INDIVIDUALLY AND )  
AS TRUSTEE OF THE JUDITH K ROGAN )  
REVOCABLE TRUST , )

Plaintiff, )

v. )

UNITED STATES OF AMERICA AND )  
DEXIA CREDIT LOCAL F/K/A DEXIA )  
PUBLIC FINANCE AND CREDIT BANK )  
AND CREDIT LOCAL DE FRANCE, )

Defendants.

No. 2:07-CV-403

Judge Joseph S. Van Bokkelen

Magistrate Judge Paul R Cherry

**DEXIA CREDIT LOCAL'S REPLY IN SUPPORT OF ITS MOTION TO EXTEND TIME  
TO ANSWER OR OTHERWISE PLEAD AND FOR A TEMPORARY  
STAY OF DISCOVERY**

Defendant Dexia Credit Local ("Dexia") hereby submits the following reply in support of its motion for: (a) an extension of time to answer or otherwise plead to and including February 11, 2008; and (b) a temporary stay of discovery pending resolution of the Dexia's motion for transfer of venue. Defendant the United States concurs with Dexia's reply.

Plaintiff opposes defendants' motions on several grounds – each of which Dexia's addresses separately below:

1. Judge Von Bokkelen's order. Plaintiff contends that Judge Von Bokkelen ruled that discovery on the preliminary injunction motion should "proceed on a simultaneous track as the motion to transfer." (Resp. at ¶ 2) Tellingly, Plaintiff does not cite Judge Von Bokkelen orders on this issue. In an order docketed on November 19, 2007, Judge Von

Bokkelen stated that he advised the parties “that the motion to transfer will be ruled on by Magistrate Judge Paul Cherry, who will also set a briefing schedule regarding non dispositive motions and discovery deadlines.” (Dckt. 28) In an order docketed on November 20, 2007, Judge Von Bokkelen referred Dexia’s motion to transfer to this Court and requested that this Court “establish an expedited scheduling order on all matters, included but not limited to briefing, discovery, and dispositive motions.” (Dckt. 31) Nowhere do either of these orders state that discovery should proceed on a simultaneous track as the transfer motion. Instead, the orders leave the scheduling to the discretion of this Court, subject to the directive that the scheduling should be “expedited.”

2. Judge Von Bokkelen’s directive on this score is best effectuated if this Court grants defendants’ motions to stay discovery. As Dexia explained in its motion, if this Court decides Dexia’s motion to transfer in an expedited manner, then: (a) judicial economy would be best served by transferring this matter *before* any exchange of discovery; and, thus, (b) the parties would address discovery issues most efficiently before the court that is already intimately familiar with this matter – namely, the Northern District of Illinois. Notably, without the short stay that defendants request, defendants, this Court, and the Northern District of Illinois would be deprived of the efficiencies that would be created by transferring this case and thus having pretrial issues involving common facts and law decided by a single court.

3. Same discovery will be necessary in both proceedings. In her opposition to Dexia’s motion to transfer, Plaintiff argued that the citation proceedings pending in the Northern District of Illinois and the instant matter are not parallel actions subject to the first-to-file rule, and that the “issues germane to the immediate matter are wholly unrelated to the

pending Illinois citation proceedings . . . .” (J. Rogan Opp. to Transfer at 26) Now, in opposing defendants’ motions to stay discovery, Plaintiff effectively states the exact opposite: that the proceedings and issues in the Northern District of Illinois and here are parallel and related such that “discovery on substantive issues in this case will be necessary no matter where the venue is ultimately fixed.” (Resp. ¶ 3) Because Plaintiff herself effectively concedes the close overlap between the proceedings in the Northern District of Illinois and here, this Court should transfer this case to the Northern District of Illinois before commencing discovery here.<sup>1</sup>

4. The escrowed sale proceeds. Plaintiff contends that delaying this case improperly ties up the escrowed proceeds from the sale of the Wexford property. (Resp. ¶¶ 1, 6) This contention is misplaced for several reasons. First, defendants do not seek to prejudice Plaintiff via improper delay tactics. As ¶ 4 of Plaintiff’s response establishes, if this Court transfers this case to the Northern District of Illinois, defendants are prepared to proceed with discovery related to the Wexford property expeditiously.

5. Second, Plaintiff has come forward with no evidence establishing how she possibly has been and is being harmed by having the sale proceeds escrowed. The sales proceeds are in an interest-bearing account, so Plaintiff is retaining the time value of the funds. Furthermore, as Dexia explained in its motion to transfer, Plaintiff and her husband literally have access to millions of dollars from both domestic and offshore sources. (Dexia Mot. to Transfer at 1-2, 14-15) Simply put, Plaintiff’s inability to use the escrowed funds will not hamper her ability to live comfortably where she now resides, *i.e.*, in Vancouver, Canada. (Ex. A)

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<sup>1</sup> Plaintiff’s opposition to the stay motions also briefly attempts to argue the merits of her opposition to the transfer motion, claiming that the Northern District of Illinois lacks personal jurisdiction over her and that this case is about conduct that occurred in Indiana. (Resp. ¶¶ 4-5) Dexia addressed these arguments

6. Third, Plaintiff can hardly claim that the all sale proceeds have been tied up given that she already has extracted more than 40% of the total proceeds. On or about November 27, 2007, the Wexford property was sold for approximately \$1.6M,<sup>2</sup> with the net proceeds of \$912,004.95 being placed in the Court-ordered and -approved escrow. (Ex. B) The great bulk of the difference between the sale price and the escrow amount, approximately \$650,000, was used to pay off a mortgage that Plaintiff took on the property in 2006 at Indy Mac Bank., the proceeds of which she then funneled to her husband.<sup>3</sup>

7. Fourth, even absent the escrow, Plaintiff should not be disposing of the sale proceeds of the Wexford property. Plaintiff's own case has put the ownership of those proceeds at issue, raising the question of whether those proceeds are hers or her husband's. She should not be heard to complain that she is being barred from disposing of funds that Plaintiff concedes are subject to a dispute in this case.

8. Moreover, Dexia's citation to discover assets against Plaintiff "prohibit[s] [her] from making or allowing any transfer or other disposition of, or interfering with, any property not exempt from execution or garnishment belonging to the judgment debtor" and informed her that the Citation created a judgment lien "upon all personal property belonging to the judgment debtor in [her] possession or control." 735 ILCS § 5/2-1402(f)(1) & (m).

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in detail in its briefing on its motion to transfer and thus does not do so again here.

<sup>2</sup> (J. Rogan Cplt., Ex. C)

<sup>3</sup> Judy Rogan caused \$632,000 in proceeds of the mortgage to be deposited into her First National Bank Valparaiso ("First National") account, against which funds she almost immediately wrote a check for \$400,000 to her husband. (Ex. C) Thereafter, over the ensuing 3½ months, Plaintiff wrote her husband six more checks off her First National account for a total of an additional \$114,500 of the mortgage loan proceeds. (Ex. D) So, a very short time after obtaining the mortgage on the Wexford property, Mrs. Rogan funneled the vast bulk of the proceeds to her husband.

Plaintiff's counsel has stated to Dexia's counsel that his client understands that, under the pending citation proceeding, Plaintiff's further disposition of these funds would be "at her peril." Nevertheless, counsel's acknowledgement that Plaintiff knows that any further disposition of the proceeds will be "at her peril" gives Dexia cold comfort in light of the fact that: (i) Plaintiff and her husband moved to Canada immediately following the court's ruling in *United States v. Rogan* and the trial in *EMC v. EPC*; (ii) since that move, Peter Rogan has repeatedly flouted clear court orders, leading Bankruptcy Judge Bruce Black to hold him in contempt for failure to comply with several different Court orders in *EMC v. EPC*; and (iii) the Rogans' sale of the Indiana property represents still another act to sever ties with the area. (Dexia Mot. to Transfer at 4-5; Dexia Reply in Supp. of Mot. to Transfer at 6, 15)

### **CONCLUSION**

For the reasons stated herein and in Dexia's motion, this Court should extend the time to and including February 11, 2008 in which to respond to the complaint and temporarily stay discovery pending resolution of the motion to transfer venue.

Respectfully submitted,

By: s/ Eric S. Pruitt  
 Scott Mendeloff  
 Gabriel Aizenberg  
 Eric S. Pruitt  
 Sidley Austin LLP  
 One S. Dearborn Street  
 Chicago, Illinois 60603  
 (312) 853-7000

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 28, 2007, I electronically filed the foregoing Dexia Credit Local's Reply In Support Of Its Motion To Extend Time To Answer Or Otherwise Plead and For A Temporary Stay of Discovery with the Clerk of the Court using the CM/ECF

system which sent notification of such filing to the following:

Gabriel Aizenberg gaizenberg@sidley.com, efilingnotice@sidley.com

David Cerven dcerven@sdllaw.com

Joshua R Diller jdiller@okmlaw.com

Alison G Fox Alison.Fox@bakerd.com

Joel L Lipman jlipman@okmlaw.com

Scott Mendeloff smendeloff@sidley.com, efilingnotice@sidley.com

Michael J O'Rourke morourke@okmlaw.com

Joseph A Stewart joseph.stewart@usdoj.gov

Joseph S Reid - AUSA joseph.reid@usdoj.gov

Linda A Wawzenski Linda.Wawzenski@usdoj.gov

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Respectfully submitted,

s/ Eric S. Pruitt

Scott Mendeloff

Gabriel Aizenberg

Eric S. Pruitt

Sidley Austin LLP

One S. Dearborn Street

Chicago, Illinois 60603

(312) 853-7000

**EXHIBIT A**



Ms. Melanie Moxie  
Oceanic Bank

Dear Ms. Moxie:

I am currently completing plans to reside in Canada. As such, I request a distribution to me of \$1,500,000 USD and request you wire that amount to my account at HSBC at 999 West Hastings St., Vancouver, British Columbia, Canada.

The wire instructions are:

Swift code: HSBC CATT

Bank number: 016

Transit number: 10280


TBO

Account name: Judith Rogan

Account number: 280 089293 203

I appreciate your assistance.

  
Judith K. Rogan

|  |  |
|--|--|
| Date requested                           | 28 Oct 07  |
| Purpose of transaction                   | Capital distribution to J. Rogan   |
| Date of payment                          | 28 Oct 07  |
| Payment method                           | Wire transfer  |
| Transaction in line with account profile | <input checked="" type="radio"/> Yes <input type="radio"/> No                        |
| XYZ documents held                       | <input checked="" type="radio"/> Yes <input type="radio"/> No                        |
| Amount of funds available on account     | \$1,500,000.00   |
| Signature agrees with account manager    |  |

R00279A



HSBC BANK CANADA  
 999 WEST HASTINGS ST., VANCOUVER  
 B.C. V6C 1M3 (604) 895 7100

17JUL2007

1

JUDITH ROGAN  
 603-1155 MAINLAND ST  
 VANCOUVER BC V6B 5P2

SSV USD

|  |           |           |
|--|-----------|-----------|
| 17JUN 2007 BALANCE FORWARD   |           | 3,901.77  |
| 19JUN TERM DEPOSIT<br>REDEMPTION   |           |           |
| <del>50,006.53</del>   | 50,006.53 | 53,908.30 |
| 20JUN FCY TRANSFER<br><del>50,006.53</del><br>JUDITH ROGAN<br><del>50,006.53</del> |           |           |
| <del>50,006.53</del>   | 40,028.22 | 13,880.08 |
| 22JUN *EB TRANSFER<br>TO <del>50,006.53</del>                                      |           |           |
| <del>50,006.53</del>   | 4,746.99  | 9,133.09  |
| 17JUL *INTEREST<br>INT TO 17-07-07   | 4.42      | 9,137.51  |

FOR CUSTOMERS BORROWING AT RATES BASED ON U.S. BASE, RATE IS 8.75 %

This instrument does not constitute a deposit that is insured under  
 the Canada Deposit Insurance Corporation Act.

HSBC00017

44,775.21

50,010.95

BALANCE

9,137.51

HSBC BANK CANADA  
 999 WEST HASTINGS ST., VANCOUVER  
 B.C. V6C 1M3 (604) 895 7100

JUDITH ROZAN  
 603-1155 MAINLAND ST  
 VANCOUVER BC V6B 5P2

17JUL2007

1

HSV CAD

17JUN 2007 BALANCE FORWARD

20JUN \*INTEREST

4,606.20

INT TO 20-06-07

11.36

20JUN \*TAX

1.14

4,616.42

FOR CUSTOMERS BORROWING AT RATES BASED ON PRIME, PRIME IS 6.25 %

TRAVELLING THIS SUMMER?

BUY THE TRAVEL INSURANCE PROTECTION YOU NEED

VISIT WWW.HSBC.CA AND CLICK ON INSURANCE

OR CALL TRAVEL UNDERWRITERS AT 1-888-838-7878 TODAY

1.14

11.36

BALANCE

4,616.42

HSBC00027

**EXHIBIT B**



**Certificate of Deposit Receipt**

**ACCOUNT TITLE**

JUDITH K ROGAN

TICOR TITLE INSURANCE CO E ESCROW AGENT

ESCROW AGREEMENT NO

**ACCOUNT NUMBER**

**DEPOSIT AMOUNT** \$912,004.95

**TERM** 3 Months

**ISSUE DATE** 11/27/2007

**MATURITY DATE** 02/27/2008

**TYPE OF MATURITY** Automatically Renewable

**INTEREST RATE** 4.88%

**ANNUAL PERCENTAGE YIELD** 5.00%

**INTEREST COMPOUNDING** Daily

**PAYMENT FREQUENCY** At maturity

**INTEREST PAYMENT METHOD** Capitalize

**ADDRESS** 476 WEXFORD RD  
VALPARAISO, IN 46385

**TAX PAYER ID NUMBER**

**ACCOUNT PURPOSE** Consumer

**TYPE OF OWNERSHIP** Escrow - Individual

**ISSUED BY** JPMorgan Chase Bank, N.A. (051)  
Broadway Center  
553  
BRIAN N GIACOMINI  
(219) 738-4180  
11/27/2007

**THIS ACCOUNT IS NONNEGOTIABLE AND NONTRANSFERABLE.** This receipt is provided solely for your convenience as an initial record of the account terms reflected on the books and records of JPMorgan Chase Bank, N.A. (the Bank), as of the date hereof. It is not an instrument, note or security and is not required to be surrendered to the Bank as a condition for redemption or withdrawal. You acknowledge receipt of the Bank's *Account Rules and Regulations* or other applicable account agreement, which includes all provisions that apply to this deposit account and the Bank Privacy Policy, and agree to be bound by the terms and conditions contained therein as may be amended from time to time.

**Penalty for Early Withdrawal**



Ticor Title Insurance Company

57 S. MICHIGAN AVENUE

VALPARAISO IN 46383

9/462-4188

FIFTH THIRD BANK OF COLUMBUS

21 E. STATE STREET

COLUMBUS OH 43215

PAY  
ONLY



91200495  
ONE THOUSAND TWELVE THOUSAND FOUR HUNDRED AND 95/100 CTS

NOVEMBER 27, 2007

FILE NO SUB DOC# CLOSER

CC: TVP IGNAPSKY

Pay

■ NINE HUNDRED TWELVE THOUSAND FOUR AND 95/100

\$912,004.95

To the  
Order of

■ Chase \*\*

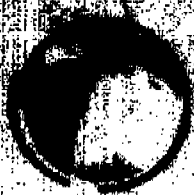
Memo

*Robert S. Jernigan*  
*William J. Jernigan*

**EXHIBIT C**



Page 1 of 1



**First National Bank**  
**VALPARAISO**


## Account:

**Name:**

**Address:**

11/30/07

The image shown below represents an official copy of the original document as processed by our institution

|   |  |  |  |                                  |  |   |  |                 |  |
|---|--|--|--|----------------------------------|--|---|--|-----------------|--|
|  |  | Tison Title Insurance Company<br>87 E. MICHIGAN AVENUE<br>WILSONVILLE IN 46381 |  | 219/463-4100                     |  | OFFICE OF THE CLERK OF COURTS<br>IN & OF THE COUNTY OF COLUMBIANA IN INDIANA<br>COLUMBIANA IN 46704 |  | JUNE 28, 2006   |  |
| PAY TO THE ORDER OF   |  | 641,707.37   |  | CASH                             |  | NEW LOAN CLOSING  |  | 501 TYP LANSING |  |
| FOR DEPOSIT ONLY  |  | SIX HUNDRED FORTY-ONE THOUSAND SEVEN HUNDRED SEVEN AND 37/100                  |  |                                  |  |   |  |                 |  |
| To the Order of   |  | JUDITH K. ROOPER, TRUSTEE  |  | under Trust dated April 18, 1999 |  |   |  |                 |  |
| Name  |  |  |  |                                  |  | Bates & Son   |  | Clerk of Courts |  |

6/28/2006  
06712027514





# First National Bank VALPARAISO

11/30/07

Account:

Name:

Address:

The image shown below represents an official copy of the original document as processed by our institution

CASH OUT TICKET TELLER

FIRST NATIONAL BANK  
OF VALPARAISO  
VALPARAISO, IN

900000

05555 3333 703

06/28/06

9000.00

94791180 11 6/28/2006  
1871202756

06-000-04  
2006/06/28 10:21:42 AM CNO6/28/06  
2006/06/28 10:21:42 AM CNO6/28/06  
2006/06/28 10:21:42 AM CNO6/28/06



# First National Bank

## VALPARAISO

11/30/07

Account:

Name:

MARGIE KOLTUNSKI OR

JUDITH K ROGAN

Address:

476 WEXFORD RD

VALPARAISO IN 46385-8045

The image shown below represents an official copy of the original document as processed by our institution

| MISC. DEBIT  |                 | First National Bank<br>VALPARAISO | DATE 7-3-06    |
|--|-----------------|-----------------------------------|----------------|
| WE HAVE ADJUSTED YOUR ACCOUNT AS TO THE REASON CIRCLED BELOW |                 |                                   | AMOUNT         |
| KEY TO REASON FOR NON-PAYMENT                                | KEY             | DRAWN ON                          |                |
| 1. ENCODING ERROR  | 6. RESEARCH FEE | WEXFORD RD                        | 63270737       |
| 2. DOUBLE POSTED CHECK                                       | 7. OTHER        | POSTING                           |                |
| 3. PHOTOCOPY   |                 | TRANSFER TO                       |                |
| 4. NON-NEGOTIABLE ITEM                                       |                 | 7009236                           |                |
| 5. POSTING ERROR   |                 |                                   |                |
| Judith Rogan<br>476 Wexford Rd<br>Valparaiso, IN 46385       |                 |                                   | ACCOUNT NUMBER |
| TRAN CODE  |                 |                                   |                |
| 19   |                 |                                   | 63270737       |
| :6666=5555:  |                 |                                   |                |

07/03/06 1560030 632707.37

|   |    |          |           |
|---|----|----------|-----------|
| 1560030   | 12 | 7/3/2006 | 587124756 |
| 1010 07/03/06 09:20:25 am CR07/03/06<br>6 First National Bank - RD 1 NMI<br>DDA TO DDA FROM ACCT: 2<br>TRANSFER AMT: 632,707.37 |    |          |           |



# First National Bank VALPARAISO

11/30/07

Account:  
Name: JUDITH K ROGAN  
Address: 476 WEXFORD RD  
VALPARAISO IN 46385-8045

The image shown below represents an official copy of the original document as processed by our institution

|  |                                 |                        |  |          |
|--|---------------------------------|------------------------|--|----------|
| <b>CHECKING DEPOSIT</b>  |                                 |                        | First National Bank<br>VALPARAISO<br>VALPARAISO, INDIANA | CURRENCY |
| NAME<br><u>Judith Rogan</u>  | DATE<br><u>7-3-06</u>           | COIN                   |  |          |
| ADDRESS<br><u>Posted to wrong acct</u>   | SIGNATURE<br><u>[Signature]</u> | CHECK(S)<br>632707.37  |  |          |
| CHECKS AND OTHER ITEMS RECEIVED FOR DEPOSIT ARE SUBJECT TO THE TERMS AND CONDITIONS OF THE FIRST NATIONAL BANK OF INDIANA ACCOUNT AGREEMENT. DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL. |                                 | TOTAL FROM OTHER SIDE  |  |          |
| ACCOUNT NUMBER   |                                 | SUB-TOTAL<br>632707.37 |  |          |
| 155554444  |                                 | LESS CASH RECEIVED     |  |          |
|  |                                 | 632707.37              |  |          |
|  |                                 | ▲ AMOUNT ▲ CREDIT      |  |          |
|  |                                 | 1,2                    |  |          |

07/03/06 1560020 632707.37

|  |       |    |    |          |    |            |    |    |    |    |    |    |    |    |    |   |   |   |   |   |   |   |   |   |                |         |       |
|--|-------|----|----|----------|----|------------|----|----|----|----|----|----|----|----|----|---|---|---|---|---|---|---|---|---|----------------|---------|-------|
| ENTER TOTAL ON THE FRONT OF THIS TICKET  | 24    | 23 | 22 | 21       | 20 | 19         | 18 | 17 | 16 | 15 | 14 | 13 | 12 | 11 | 10 | 9 | 8 | 7 | 6 | 5 | 4 | 3 | 2 | 1 | CHECKS DEPOSIT | DOLLARS | CENTS |
|  | TOTAL |    | 12 | 7/3/2006 |    | 2071292754 |    |    |    |    |    |    |    |    |    |   |   |   |   |   |   |   |   |   |                |         |       |
| 48 NO 07/03/06 09:20:25 AM (2007/03/06)<br>6 First National Bank of Indiana<br>BOA TO BOA TO ACCT#<br>TRANSFER AMT: 632,707.37 |       |    |    |          |    |            |    |    |    |    |    |    |    |    |    |   |   |   |   |   |   |   |   |   |                |         |       |

JUDITH K. ROGAN  
471 WISCONSIN RD.  
WALPARGO, WI 43085

629.06

Peter J. Rogan

Four Hundred Thousand & 00/100 \$400,000.00

FIRST NATIONAL BANK

06/30/2006 \$400,000.00

Judith K. Rogan



**EXHIBIT D**

JUDITH K ROGAN  
476 WEXFORD RD  
VALPARAISO IN 46385-8045

Account No.: \_\_\_\_\_

Statement Date: **07/03/06** Page: **1**

**This Statement Cycle Reflects 31 Days**

### INVESTMENT CHECKING SUMMARY

| Category                       | Number    | Amount      |
|--------------------------------|-----------|-------------|
| Balance Forward From 06/02/06  |           | 27,819.23   |
| Deposits                       | 1         | 632,707.37+ |
| Checks                         | 14        | 720,296.56  |
| Automatic Withdrawals          | 10        | 19,517.31   |
| Automatic Deposits             | 3         | 325,000.00+ |
| Interest Added This Statement  |           | 18.38+      |
| SERVICE CHARGE                 |           | 7.50        |
| Ending Balance On 07/03/06     |           | 245,723.61  |
| Annual Percentage Yield Earned | 0.30%     |             |
| Interest Paid This Year        | 246.92    |             |
| Interest Paid Last Year        | 484.73    |             |
| Average Balance (Collected)    | 72,152.03 |             |

### DEPOSITS AND OTHER CREDITS

| Date     | Type    | Amount     | Date | Type | Amount | Date | Type | Amount |
|----------|---------|------------|------|------|--------|------|------|--------|
| 07/03/06 | DEPOSIT | 632,707.37 |      |      |        |      |      |        |

### ELECTRONIC CREDITS

| Date     | Description                          | Amount     |
|----------|--------------------------------------|------------|
| 06/07/06 | 011: GOVT MMKT INVESTMENT            | 75,000.00  |
| 06/13/06 | WT IN JUDITH K ROGAN REVOCABLE TRUST | 150,000.00 |
| 06/22/06 | 011: GOVT MMKT INVESTMENT            | 100,000.00 |
| 07/03/06 | INTEREST PAID                        | 18.38      |

### ELECTRONIC DEBITS

| Date     | Description | Amount |
|----------|-------------|--------|
| 06/13/06 | WT IN FEE   | 10.00  |

R 00425

|   |  |             |
|---|--|-------------|
| JUDITH K. ROGAN<br>476 WENDFORD RD.<br>VALPARAISO, IN 46388 |  | 4659        |
| DATE 7-20-06  |  |             |
| Pay to the order of Peter B. Rogan                          |  | \$30,000.00 |
| Thirty Thousand & 00/100                                    |  |             |
| FIRST NATIONAL BANK   |  |             |
| Judith K. Rogan   |  |             |

07/21/2006 4659 \$30,000.00

JUDITH K. ROGAN  
478 WESFORD RD.  
VALPARAISO, IN 46386

7-2006

4695

Peter B. Rogan \$10,000.00

Ten Thousand & 00/100

FIRST NATIONAL BANK

Judith K. Rogan

07/21/2006 4695 \$10,000.00

JUDITH K. ROGAN  
491 BEDFORD RD.  
WALPOLE, NH 03090

PAID TO THE ORDER OF  
PETER K. ROGAN

15,000.00

Fifteen Thousand & 00/100

FIRST NATIONAL BANK

Judith K. Rogan

08/23/2006 4672 \$15,000.00

JUDITH K. ROGAN  
470 NEWPORT RD.  
VALPARAISO, OH 46386

71-99776  
FEDERAL RESERVE

ST. 4691

DATE 9-8-06

PAY TO THE ORDER OF Peter K. Rogan \$ 50,000.00

Fifty Thousand & 00/100

FIRST NATIONAL BANK

Judith K. Rogan

09/11/2006 4691 \$50,000.00



|  |  |                        |         |
|--|--|------------------------|---------|
| JUDITH K. ROGAN<br>478 WEXFORD RD.<br>VALPARAISO, IN 46386 |  | 71-475/718<br>708534   | 5% 4718 |
| Date <u>9-27-06</u>  |  |                        |         |
| Pay to the order of <u>Judith K. Rogan</u>                 |  | \$ <u>7,500.00</u>     |         |
| <u>Seven Thousand Five Hundred</u>                         |  | <u>00/100</u>          |         |
| FIRST NATIONAL BANK  |  | <u>Judith K. Rogan</u> |         |

09/28/2006 4718 \$7,500.00

JUDITH K. ROGAN  
176 WESTFORD RD.  
VALPARAISO, IN 46086

7-20/74  
2006

JL 4736

10-19-06

Peter B. Rogan

Two Thousand and no/100

\$ 2000.00

FIRST NATIONAL BANK

Judith K. Rogan

10/23/2006 4736 \$2,000.00